

**PART 70 OPERATING PERMIT  
and ENHANCED NEW SOURCE REVIEW  
OFFICE OF AIR MANAGEMENT**

**Casteel Services, Inc.  
5 Line Road  
Kingsbury, Indiana 46345**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 091-7587-00081	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

## TABLE OF CONTENTS

### A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]  
[326 IAC 2-7-5(15)]
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]
- A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

### B GENERAL CONDITIONS

- B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]
- B.2 Definitions [326 IAC 2-7-1]
- B.3 Permit Term [326 IAC 2-7-5(2)]
- B.4 Enforceability [326 IAC 2-7-7(a)]
- B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]
- B.6 Severability [326 IAC 2-7-5(5)]
- B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
- B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]
- B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]
- B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]
- B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]
- B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1)  
and (6)] [326 IAC 1-6-3]
- B.13 Emergency Provisions [326 IAC 2-7-16]
- B.14 Permit Shield [326 IAC 2-7-15]
- B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]
- B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
- B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]
- B.18 Permit Renewal [326 IAC 2-7-4]
- B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]
- B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC  
2-7-12(b)(2)]
- B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]
- B.22 Operational Flexibility [326 IAC 2-7-20]
- B.23 Construction Permit Requirement [326 IAC 2]
- B.24 Inspection and Entry [326 IAC 2-7-6(2)]
- B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]
- B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]
- B.27 Enhanced New Source Review [326 IAC 2]

### C SOURCE OPERATION CONDITIONS

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Major Source
- C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates  
Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]
- C.3 Opacity [326 IAC 5-1]
- C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

- C.6 Fugitive Dust Emissions [326 IAC 6-4]
- C.7 Operation of Equipment [326 IAC 2-7-6(6)]
- C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

**Testing Requirements [326 IAC 2-7-6(1)]**

- C.9 Performance Testing [326 IAC 3-6]

**Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

- C.10 Compliance Schedule [326 IAC 2-7-6(3)]
- C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]
- C.13 Monitoring Methods [326 IAC 3]
- C.14 Pressure Gauge Specifications

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

- C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5]  
[326 IAC 2-7-6] [326 IAC 1-6]
- C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]  
[326 IAC 2-6]
- C.20 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
- C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
- C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

**Stratospheric Ozone Protection**

- C.23 Compliance with 40 CFR 82 and 326 IAC 22-1

**D.1 FACILITY OPERATION CONDITIONS - Handling, Core Machines, Pouring, Cooling, Shakeout, Sand handling**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.1.2 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

**Compliance Determination Requirements**

- D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

**D.2 FACILITY OPERATION CONDITIONS - Two (2) shot blasting facilities and baghouse**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.2.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]
- D.2.3 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

**Compliance Determination Requirements**

- D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

D.2.5 Particulate Matter (PM)

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

- D.2.6 Visible Emissions Notations
- D.2.7 Parametric Monitoring
- D.2.8 Baghouse Inspections
- D.2.9 Broken Bag or Failed Bag Detection

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

- D.2.10 Record Keeping Requirements

**D.3 FACILITY OPERATION CONDITIONS - Insignificant Activities - Two (2) electric induction furnaces (IF-1 and IF-2); Shakeout/knockout; chipping/grinding; arc wash; two (2) annealing furnaces; three (3) sand silos**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

- D.3.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.3.2 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

**Compliance Determination Requirements**

- D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

**Certification Form**

**Semi-Annual Compliance Monitoring Form**

**Emergency/Deviation Occurrence Report**

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

---

The Permittee owns and operates a stationary steel foundry.

Responsible Official: William J. Downey  
Source Address: 5 Line Road, Kingsbury, Indiana 46345  
Mailing Address: P.O. Box 355, Kingsbury, Indiana 46345-0355  
SIC Code: 3325  
County Location: LaPorte  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Major Source, under PSD Rules

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

---

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) covered scrap area, identified as CH-1.
- (b) One (1) chromite core machine, with a maximum capacity of 2.1 tons of sand per hour.
- (c) One (1) small molding machine, with a maximum capacity of 3.3 tons of sand per hour.
- (d) One (1) large molding machine, with a maximum capacity of 4.5 tons of sand per hour.
- (e) One (1) pouring facility, identified as P-1, with a maximum throughput of 13.9 tons per hour, including 4.0 tons of metal and 9.9 tons of sand molds.
- (f) One (1) cooling facility, identified as C-1, with a maximum throughput of 13.9 tons per hour.
- (g) One (1) cold shakeout facility, with a maximum throughput of 13.9 tons per hour.
- (h) One (1) shot blast facility, identified as SB-1, with a maximum throughput of 4.0 tons per hour, controlled by a baghouse (BH-1) and exhausting through stack SBH-1.
- (i) One (1) shot blast facility, identified as SB-2, with a maximum throughput of 4.0 tons per hour, controlled by a baghouse (BH-1) and exhausting through stack SBH-1; constructed in August 1988.
- (j) One (1) sand handling system with a maximum capacity of 9.90 tons of sand per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) One (1) electric induction melting furnace, identified as IF-1, with a capacity of 2.0 tons of metal per hour.
- (b) One (1) electric induction melting furnace, identified as IF-2, with a capacity of 2.0 tons of metal per hour; constructed in September 1987.
- (c) Shakeout/knockout; chipping/grinding; arc wash; two (2) annealing furnaces; three (3) sand silos.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

**SECTION B**

**GENERAL CONDITIONS**

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

**B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]**

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

**B.6 Severability [326 IAC 2-7-5(5)]**

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

**B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]**

This permit does not convey any property rights of any sort, or any exclusive privilege.

**B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]**

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

**B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]**

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
- (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.

- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

**B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]**

---

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

**B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]**

---

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was based on continuous or intermittent data;



- (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
- (5) Any insignificant activity that has been added without a permit revision; and
- (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]**  
**[326 IAC 1-6-3]**

- 
- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
    - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
    - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
    - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

**B.13 Emergency Provisions [326 IAC 2-7-16]**

- 
- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.

- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.14 Permit Shield [326 IAC 2-7-15]**

---

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
  - (1) The applicable requirements are included and specifically identified in this permit; or
  - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

**B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) An emergency as defined in 326 IAC 2-7-1(12); or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
  - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination**  
**[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

---

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.18 Permit Renewal [326 IAC 2-7-4]**

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]
  - (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM,, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

**B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]**

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]**

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

**B.22 Operational Flexibility [326 IAC 2-7-20]**

---

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.



The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.23 Construction Permit Requirement [326 IAC 2]**

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

**B.24 Inspection and Entry [326 IAC 2-7-6(2)]**

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]
  - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source.

In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

- (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

**B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]**  
Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM, shall reserve the right to issue a new permit.

**B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

**B.27 Enhanced New Source Review [326 IAC 2]**

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source
---------------

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

**C.1 Major Source**

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, this source is a major source.

**C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]**

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

**C.3 Opacity [326 IAC 5-1]**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

**C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]**

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

**C.6 Fugitive Dust Emissions [326 IAC 6-4]**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

**C.7 Operation of Equipment [326 IAC 2-7-6(6)]**

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) Indiana Accredited Asbestos Inspector  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.
- 

### **Testing Requirements [326 IAC 2-7-6(1)]**

#### **C.9 Performance Testing [326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

#### **C.10 Compliance Schedule [326 IAC 2-7-6(3)]**

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

#### **C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit.

If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

**C.13 Monitoring Methods [326 IAC 3]**

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

**C.14 Pressure Gauge Specifications**

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 12, 1996.
- (b) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (e) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
  - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
  - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
  - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
  - (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
  - (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
    - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
    - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
    - (3) An automatic measurement was taken when the process was not operating; or
    - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
  - (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]**
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented.



IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]**

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

**C.20 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]**

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;

- (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

### **Stratospheric Ozone Protection**

#### **C.23 Compliance with 40 CFR 82 and 326 IAC 22-1**

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

### **SECTION D.1**

### **FACILITY OPERATION CONDITIONS**

#### **Facility Description [326 IAC 2-7-5(15)]**

- (a) One (1) covered scrap area, identified as CH-1.
- (b) One (1) chromite core machine, with a maximum capacity of 2.1 tons of sand per hour.
- (c) One (1) small molding machine, with a maximum capacity of 3.3 tons of sand per hour.
- (d) One (1) large molding machine, with a maximum capacity of 4.5 tons of sand per hour.
- (e) One (1) pouring facility, identified as P-1, with a maximum throughput of 13.9 tons per hour, including 4 tons of metal and 9.9 tons of sand molds.
- (f) One (1) cooling facility, identified as C-1, with a maximum throughput of 13.9 tons per hour.
- (g) One (1) cold shakeout facility, with a maximum throughput of 13.9 tons per hour.
- (j) One (1) sand handling system with a maximum capacity of 9.90 tons of sand per hour.

#### **Emission Limitations and Standards [326 IAC 2-7-5(1)]**

##### **D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]**

Pursuant to 326 IAC 6-3 (Process operations):

- (a) The allowable PM emission rate from the scrap and charge handling processes shall not exceed 10.4 pounds per hour when operating at a process weight rate of 4.0 tons per hour.

- (b) The allowable PM emission rate from the pouring facility (P-1) shall not exceed 23.9 pounds per hour when operating at a process weight rate of 13.9 tons per hour.
- (c) The allowable PM emission rate from the cooling facility (C-1) shall not exceed 23.9 pounds per hour when operating at a process weight rate of 13.9 tons per hour.
- (d) The allowable PM emission rate from the cold shakeout facility shall not exceed 23.9 pounds per hour when operating at a process weight rate of 13.9 tons per hour.
- (e) The allowable PM emission rate from the sand handling processes shall not exceed 19.0 pounds per hour when operating at a process weight rate of 9.9 tons per hour.
- (f) The allowable PM emission rate from the three (3) core machines including the chromite core machine, the small molding machine and large molding machine shall not exceed a total of 19.0 pounds per hour when operating at a process weight rate of 9.9 tons per hour.

The pounds per hour limitations were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour.}$$

#### D.1.2 Prevention of Significant Deterioration [326 IAC 2-2]

Any change or modification that results in an increase in the potential to emit after controls of 25 tons per year or more of PM or 15 tons per year or more of PM<sub>10</sub> from the one (1) covered scrap area, identified as CH-1, one (1) pouring facility, identified as P-1, one (1) cooling facility, identified as C-1, one (1) cold shakeout facility, one (1) sand handling system, one (1) chromite core machine, one (1) small molding machine, one (1) large molding machine, and insignificant activities, excluding the two (2) electric induction melting furnaces, shall require a PSD permit pursuant to 326 IAC 2-2, Prevention of Significant Deterioration.

### **Compliance Determination Requirements**

#### D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance. If testing is required by IDEM, compliance with the PM limits specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (h) One (1) shot blast facility, identified as SB-1, with a maximum throughput of 4.0 tons per hour, controlled by a baghouse (BH-1) and exhausting through stack SBH-1.
- (i) One (1) shot blast facility, identified as SB-2, with a maximum throughput of 4.0 tons per hour, controlled by a baghouse (BH-1) and exhausting through stack SBH-1; constructed in August 1988.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the two (2) shot blasting facilities shall not exceed 10.4 pounds per hour when operating at a process weight rate of 4.0 tons per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour.

#### D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control device.

#### D.2.3 Prevention of Significant Deterioration [326 IAC 2-2]

- (a) Any change or modification that results in an increase in the potential to emit after controls to 25 tons per year or more of PM or 15 tons per year or more of PM<sub>10</sub> from the one (1) shot blast facility, identified as SB-1, and one (1) electric induction melting furnace, identified as IF-1, shall require a PSD permit pursuant to 326 IAC 2-2, Prevention of Significant Deterioration.
- (b) Any change or modification that results in an increase in the potential to emit after controls to 25 tons per year or more of PM or 15 tons per year or more of PM<sub>10</sub> from the one (1) electric induction melting furnace, identified as IF-2, and one (1) shot blast facility, identified as SB-2, shall require a PSD permit pursuant to 326 IAC 2-2, Prevention of Significant Deterioration.

## **Compliance Determination Requirements**

### **D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)]**

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM testing of the two (2) shot blast facilities, SB-1 and SB-2, utilizing Methods 5 or 17 (40 CFR 60, Appendix A), or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

### **D.2.5 Particulate Matter (PM)**

The baghouse (BH-1) for PM control shall be in operation at all times when either or both of the two (2) shot blasting facilities (SB-1 and SB-2) are in operation.

## **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

### **D.2.6 Visible Emissions Notations**

- (a) Daily visible emission notations of the baghouse stack (SBH-1) exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

### **D.2.7 Parametric Monitoring**

The Permittee shall record the total static pressure drop across the baghouse (BH-1) used in conjunction with the two (2) shot blasting facilities (SB-1 and SB-2), at least once daily when the two (2) shot blasting facilities (SB-1 and SB-2) are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 2.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

#### D.2.8 Baghouse Inspections

---

An inspection shall be performed each calendar quarter of all bags controlling the shot blast facilities operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

#### D.2.9 Broken Bag or Failed Bag Detection

---

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### D.2.10 Record Keeping Requirements

---

- (a) To document compliance with Condition D.2.5 and D.2.6, the Permittee shall maintain records of daily visible emission notations of the baghouse stack (SBH-1) exhaust.
- (b) To document compliance with Condition D.2.7, the Permittee shall maintain the following:
  - (1) Daily records of the inlet and outlet differential static pressure during normal operation when venting to the atmosphere.
  - (2) Documentation of all response steps implemented, per event .
  - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
  - (4) Quality Assurance/Quality Control (QA/QC) procedures.
  - (5) Operator standard operating procedures (SOP).
  - (6) Manufacturer's specifications or its equivalent.
  - (7) Equipment "troubleshooting" contingency plan.



- (8) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.2.8, the Permittee shall maintain records of the results of the inspections required under Condition D.2.8 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### SECTION D.3

### FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activities	
(a)	One (1) electric induction melting furnace, identified as IF-1, with a capacity of 2.0 tons of metal per hour.
(b)	One (1) electric induction melting furnace, identified as IF-2, with a capacity of 2.0 tons of metal per hour; constructed in September 1987.
(c)	Shakeout/knockout; chipping/grinding; arc wash; two (2) annealing furnaces; three (3) sand silos



### Process Weight Activities

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.3.1 Particulate Matter (PM) [326 IAC 6-3]

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the shakeout/ knockout, chipping/grinding, arc wash, two (2) annealing furnaces, and three (3) sand silos shall each not exceed the allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the two (2) electric induction melting furnaces shall not exceed 6.52 pounds per hour when operating at a process weight rate of 2.0 tons per hour, each.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour.}$$

**D.3.2 Prevention of Significant Deterioration [326 IAC 2-2]**

---

- (a) As stated in Condition D.1.2, any change or modification that results in an increase in the potential to emit after controls of 25 tons per year or more of PM or 15 tons per year or more of PM<sub>10</sub> from the one (1) covered scrap area, identified as CH-1, one (1) pouring facility, identified as P-1, one (1) cooling facility, identified as C-1, one (1) cold shakeout facility, one (1) sand handling system, one (1) chromite core machine, one (1) small molding machine, one (1) large molding machine, and insignificant activities, excluding the two (2) electric induction melting furnaces, shall require a PSD permit pursuant to 326 IAC 2-2, Prevention of Significant Deterioration.
- (b) As stated in Condition D.2.3(a), any change or modification that results in an increase in the potential to emit after controls to 25 tons per year or more of PM or 15 tons per year or more of PM<sub>10</sub> from the one (1) shot blast facility, identified as SB-1, and one (1) electric induction melting furnace, identified as IF-1, shall require a PSD permit pursuant to 326 IAC 2-2, Prevention of Significant Deterioration.
- (c) As stated in Condition D.2.3(b), any change or modification that results in an increase in the potential to emit after controls to 25 tons per year or more of PM or 15 tons per year or more of PM<sub>10</sub> from the one (1) electric induction melting furnace, identified as IF-2, and one (1) shot blast facility, identified as SB-2, shall require a PSD permit pursuant to 326 IAC 2-2, Prevention of Significant Deterioration.

**Compliance Determination Requirement**

**D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)]**

---

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance. If testing is required by IDEM, compliance with the PM limits specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Casteel Services, Inc.  
Source Address: 5 Line Road, Kingsbury, Indiana 46345  
Mailing Address: P.O. Box 355, Kingsbury, Indiana 46345-0355  
Part 70 Permit No.: T 091-7587-00081

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- ☒ Annual Compliance Certification Letter
- ☐ Test Result (specify) \_\_\_\_\_
- ☐ Report (specify) \_\_\_\_\_
- ☐ Notification (specify) \_\_\_\_\_
- ☐ Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: Casteel Services, Inc.  
Source Address: 5 Line Road, Kingsbury, Indiana 46345  
Mailing Address: P.O. Box 355, Kingsbury, Indiana 46345-0355  
Part 70 Permit No.: T 091-7587-00081

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD**

**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

<b>Compliance Monitoring Requirement</b> (e.g. Permit Condition D.1.3)	<b>Number of Deviations</b>	<b>Date of Each Deviation</b>

Form Completed By: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR MANAGEMENT**  
**COMPLIANCE DATA SECTION**  
**P.O. Box 6015**  
**100 North Senate Avenue**  
**Indianapolis, Indiana 46206-6015**  
**Phone: 317-233-5674**  
**Fax: 317-233-5967**

**PART 70 OPERATING PERMIT**  
**EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Casteel Services, Inc.  
Source Address: 5 Line Road, Kingsbury, Indiana 46345  
Mailing Address: P.O. Box 355, Kingsbury, Indiana 46345-0355  
Part 70 Permit No.: T 091-7587-00081

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2	
9 1.	This is an emergency as defined in 326 IAC 2-7-1(12)
C	The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C	The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2.	This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
C	The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

**Indiana Department of Environmental Management  
Office of Air Management  
and IDEM/Northwest Indiana Office**

**Technical Support Document (TSD) for a Part 70 Operating Permit and  
Enhanced New Source Review**

**Source Background and Description**

**Source Name:** Casteel Services, Inc.  
**Source Location:** 5 Line Road, Kingsbury, Indiana 46345  
**County:** LaPorte  
**SIC Code:** 3325  
**Operation Permit No.:** T091-7587-00081  
**Permit Reviewer:** CarrieAnn Ortolani

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Casteel Services, Inc. relating to the operation of a steel foundry. Casteel Services, Inc. was previously named Teledyne Casting Service.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) covered scrap area, identified as CH-1.
- (b) One (1) electric induction melting furnace, identified as IF-1, with a capacity of 2.0 tons of metal per hour.
- (c) One (1) chromite core machine, with a maximum capacity of 2.1 tons of sand per hour.
- (d) One (1) small molding machine, with a maximum capacity of 3.3 tons of sand per hour.
- (e) One (1) large molding machine, with a maximum capacity of 4.5 tons of sand per hour.
- (f) One (1) pouring facility, identified as P-1, with a maximum throughput of 13.9 tons per hour, including 4.0 tons of metal and 9.9 tons of sand molds.
- (g) One (1) cooling facility, identified as C-1, with a maximum throughput of 13.9 tons per hour.
- (h) One (1) cold shakeout facility, with a maximum throughput of 13.9 tons per hour.
- (i) One (1) shot blast facility, identified as SB-1, with a maximum throughput of 4.0 tons per hour, controlled by a baghouse (BH-1) and exhausting through stack SBH-1.

**Unpermitted Emission Units and Pollution Control Equipment**

The source also consists of the following unpermitted facilities/units:

- (j) One (1) electric induction melting furnace, identified as IF-2, with a capacity of 2.0 tons of metal per hour; constructed in September 1987.

- (k) One (1) shot blast facility, identified as SB-2, with a maximum throughput of 4.0 tons per hour, controlled by a baghouse (BH-1) and exhausting through stack SBH-1; constructed in August 1988.

### **Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)**

Items (j) and (k) listed above are being reviewed under the ENSR process.

### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
- (b) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (c) Refractory storage not requiring air pollution control equipment.
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment.
- (e) Any of the following structural steel and bridge fabrication activities: cutting 200,000 linear feet or less of one inch (1") plate or equivalent; using 80 tons or less of welding consumables.
- (f) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs.
- (g) Water based adhesives that are less than or equal to 5 percent by volume of VOCs excluding HAPs.
- (h) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (i) Paved and unpaved roads and parking lots with public access.
- (j) Conveyors as follows: underground conveyors.
- (k) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kiloPascals measured at 38EC).
- (l) Shakeout/knockout; chipping/grinding; arc wash; two (2) annealing furnaces; three (3) sand silos.

### **Existing Approvals**

The source has been operating under the following approvals:

- (a) CP (46) 1049, issued on December 22, 1976.
- (b) OP 46-06-79-0075, issued on March 13, 1978.



- (c) Registration (no number), issued on January 19, 1984.

#### **Enforcement Issue**

- (a) IDEM is aware that the following equipment has been constructed and operated prior to receipt of the proper permit:
- (1) One (1) electric induction melting furnace, identified as IF-2, with a capacity of 2.0 tons of metal per hour; constructed in September 1987.
  - (2) One (1) shot blast facility, identified as SB-2, with a maximum throughput of 4.0 tons per hour, controlled by a baghouse (BH-1) and exhausting through stack SBH-1; constructed in August 1988.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.
- (c) There are no enforcement actions pending.

#### **Recommendation**

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 13, 1996. A notice of completeness letter was mailed to the source on January 16, 1997.

#### **Emission Calculations**

See pages 1 through 6 of Appendix A of this document for detailed emissions calculations

#### **Potential Emissions**

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	greater than 250
PM <sub>10</sub>	greater than 250
SO <sub>2</sub>	less than 100
VOC	less than 100
CO	less than 100
NO <sub>x</sub>	less than 100

Note: For the purpose of determining Title V applicability for particulates,  $PM_{10}$ , not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Manganese	less than 10
Phosphorus	less than 10
Lead	less than 10
TOTAL	less than 25

- (a) The potential emissions (as defined in the Indiana Rule) of  $PM_{10}$  are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions  
Since this type of operation is one of the 28 listed source categories under 326 IAC 2-2 the fugitive particulate matter (PM) emissions are counted toward determination of PSD and Emission Offset applicability.

#### Actual Emissions

The following table shows the actual emissions from the source. This information reflects the source's 1995 emission data indicated in the application. This is not the data from the OAM Emission Reporting Inventory, since there is no emission listing for this source at the present time.

Pollutant	Actual Emissions (tons/year)
PM	5.80
$PM_{10}$	5.80
$SO_2$	negligible
VOC	negligible
CO	negligible
HAPs	negligible
$NO_x$	negligible

#### Limited Potential to Emit

The table below summarizes the total limited potential to emit of the emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Scrap & Charge Handling (CH-1), Pouring (P-1), Cooling (C-1), Shakeout, Sand Handling, Core Machines (chromite core machine, small and large molding machines)	216	190	0.00	0.00	0.00	0.00	0.516
Electric Induction Furnaces (IF-1 and IF-2)	1.75	1.58	0.00	0.00	0.00	0.00	0.764
Two (2) Shot Blasting Units (SB-1 and SB-2)	9.58 (45.6)	9.58 (45.6)	0.00	0.00	0.00	0.00	0.00
Insignificant Activities	10.0	10.0	1.00	1.00	2.00	10.0	0.00
Total Emissions	237 (273)	211 (247)	1.00	1.00	2.00	10.0	1.28

- (a) The values in the table are the potential emissions after controls.
- (b) The values in parenthesis represent the maximum allowable PM and corresponding PM<sub>10</sub> emissions from the shot blasting facilities based on the hourly PM limitations of 326 IAC 6-3-2.
- (c) The allowable PM emissions from the facilities other than the shot blast facilities are not presented in this table since only the shot blasting facilities need to operate a control device in order to comply with 326 IAC 6-3-2. The shot blasting units, when operating with the baghouse in operation, comply with 326 IAC 6-3-2 as indicated in this table.
- (d) See pages 1 through 5 of 6 of TSD Appendix A for detailed calculations.
- (e) Attached Tables 1, 2 and 3 summarize the permit conditions and requirements.

### County Attainment Status

The source is located in LaPorte County.

Pollutant	Status
TSP	attainment
PM <sub>10</sub>	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. LaPorte County has been designated as attainment or unclassifiable for ozone.

## **Part 70 Permit Conditions**

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

## **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (326 IAC 12) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) applicable to this source.

## **State Rule Applicability - Entire Source**

### **326 IAC 2 -2 (PSD)**

Since this type of operation is one of the 28 listed source categories under 326 IAC 2-2, the permitted facilities have actual emissions greater than what would constitute a major source pursuant to 326 IAC 2-2, PSD (100 tons per year of PM and PM<sub>10</sub>). This source did not undergo PSD review, because the addition of the electric induction furnace (IF-2) in 1987 and the addition of the shot blasting facility (SB-2) represent minor modifications to an existing minor source and as such did not require a PSD review. Future modifications to this source will be subject to the PSD threshold levels. Any modifications with emissions after controls exceeding the PSD threshold levels will be subject to PSD review.

### **326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than 100 tons per year of PM<sub>10</sub>. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

### **326 IAC 5-1 (Visible Emissions Limitations)**

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,

- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

#### **State Rule Applicability - Individual Facilities**

##### **326 IAC 6-3-2 (Process Operations)**

- (a) The particulate matter (PM) emissions from the scrap and charge handling processes will be limited to 10.4 pounds per hour for a process weight rate of 4.0 tons per hour. Since potential PM emissions from the scrap and charge handling processes are 2.40 pounds per hour, the scrap and charge handling processes will comply with this rule.
- (b) The particulate matter (PM) emissions from each of the two (2) electric induction melting furnaces (IF-1 and IF-2) will be limited to 6.52 pounds per hour for a process weight rate of 2.0 tons per hour, each. Since potential PM emissions from each electric induction melting furnace (IF-1 and IF-2) are 0.200 pounds per hour, both electric induction melting furnaces (IF-1 and IF-2) will comply with this rule.
- (c) The particulate matter (PM) emissions from the pouring facility (P-1) will be limited to 23.9 pounds per hour for a process weight rate of 13.9 tons per hour. Since potential PM emissions from the pouring facility (P-1) are 11.2 pounds per hour, the pouring facility (P-1) will comply with this rule.
- (d) The particulate matter (PM) emissions from the cooling facility (C-1) will be limited to 23.9 pounds per hour for a process weight rate of 13.9 tons per hour. Since potential PM emissions from the cooling facility (C-1) are 5.60 pounds per hour, the cooling facility (C-1) will comply with this rule.
- (e) The particulate matter (PM) emissions from the cold shakeout facility will be limited to 23.9 pounds per hour for a process weight rate of 13.9 tons per hour. Since potential PM emissions from the cold shakeout facility are 12.8 pounds per hour, the cold shakeout facility will comply with this rule.
- (f) The particulate matter (PM) emissions from the sand handling processes will be limited to 19.0 pounds per hour for a process weight rate of 9.9 tons per hour. Since potential PM emissions from the sand handling processes are 6.44 pounds per hour, the sand handling processes will comply with this rule.
- (g) The particulate matter (PM) emissions from the three (3) core machines including the chromite core machine, the small molding machine and large molding machine will be limited to 19.0 pounds per hour for a process weight rate of 9.9 tons per hour. Since potential PM emissions from the three (3) core machines are 10.9 pounds per hour, the three (3) core machines will comply with this rule.
- (h) The particulate matter (PM) emissions from the two (2) shot blasting facilities will be limited to 10.4 pounds per hour for a process weight rate of 4.0 tons per hour. Since potential PM emissions after controls from the combination of the two (2) shot blasting facilities are 2.19 pounds per hour, the two (2) shot blasting facilities will comply with this rule. Compliance will be demonstrated by operating the baghouse (BH-1) at all times when either or both of the two (2) shot blasting facilities are in operation.

The limits stated above are based on the following equation for facilities with process weight rates of up to 60,000 pounds per hour:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

See pages 1 through 5 of 6 of TSD Appendix A for detailed calculations.

### Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (a) The scrap & charge handling (CH-1), pouring (P-1), cooling (C-1), shakeout, sand handling, and core machines (chromite core machine, small and large molding machines) have applicable compliance monitoring conditions as specified below:

Daily visible emissions notations for each facility shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

This monitoring condition is necessary to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

- (b) The two (2) electric induction furnaces (IF-1 and IF-2) have applicable compliance monitoring conditions as specified below:

Daily visible emissions notations for the two (2) electric induction furnaces shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

This monitoring condition is necessary to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

- (c) The two (2) shot blasting facilities (SB-1 and SB-2) have applicable compliance monitoring conditions as specified below:
- (1) Daily visible emissions notations of the baghouse stack exhaust (SBH-1) shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
  - (2) The Permittee shall record the total static pressure drop across the baghouse controlling the two (2) shot blasting facilities, once per shift when both shot blasting facilities are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 2.0 to 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary because the baghouse (BH-1) for controlling particulate emissions from the two (2) shot blasting facilities (SB-1 and SB-2) must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Amendments to the Clean Air Act.
- (b) See page 6 of 6 of TSD Appendix A for detailed air toxic calculations.

### **Conclusion**

The operation of this steel foundry shall be subject to the conditions of the attached proposed **Part 70 Permit No. T091-7587-00081**.

**Table 1**

**Description of facilities:** scrap & charge handling (CH-1), pouring (P-1), cooling (C-1), shakeout, sand handling and core machines  
**Max Rating:** 4.0 tons of metal per hour produced  
**Construction Date:** 1975 (P-1 and C-1), all others prior to 1984  
**Control Device (if any):** none  
**Stack/Vent ID:** N/A

**Facility class:** 031      **Description:** scrap & charge handling (CH-1), pouring (P-1), cooling (C-1), shakeout, sand handling, and core machines

EMISSION LIMITATIONS			
Numerical Emission Limit:	10.4 pounds PM per hour (CH-1)	23.9 pounds PM per hour each (P-1, C-1, & shakeout)	19.0 pounds PM per hour, each (sand handling & core machines)
Regulation/Citation:	326 IAC 6-3-2	326 IAC 6-3-2	326 IAC 6-3-2
Compliance Demonstration:	N/A	N/A	N/A
PERFORMANCE TESTING			
Parameter/Pollutant to be Tested:			
Testing Method/Analysis:			
Testing Frequency/Schedule:			
Submittal of Test Results:			
COMPLIANCE MONITORING			
Monitoring Description:	visible emissions	visible emissions	visible emissions
Monitoring Method:	visual	visual	visual
Monitoring Regulation/Citation:	326 IAC 2-7-6(1)	326 IAC 2-7-6(1)	326 IAC 2-7-6(1)
Monitoring Frequency:	daily	daily	daily
RECORD KEEPING			
Parameter/Pollutant to be Recorded:	visible emissions	visible emissions	visible emissions
Recording Frequency:	daily	daily	daily
REPORTING REQUIREMENTS			
Information in Report:	summary of deviations	summary of deviations	summary of deviations
Reporting Frequency/Submittal:	as necessary within 10 days of discovery of deviation	as necessary within 10 days of discovery of deviation	as necessary within 10 days of discovery of deviation
Additional Comments:			



**Table 2**

**Description of facility:** Two (2) electric induction furnaces (IF-1 and IF-2)  
**Max Rating:** 2.0 tons per hour, each  
**Construction Date:** 1982 (IF-1) and 1987 (IF-2)  
**Control Device (if any):** none  
**Stack/Vent ID:** N/A

**Facility class:** 040      **Description:** Two (2) electric induction furnaces (IF-1 and IF-2)

<b>EMISSION LIMITATIONS</b>			
<b>Numerical Emission Limit:</b>	6.52 pounds PM per hour, each		
<b>Regulation/Citation:</b>	326 IAC 6-3-2		
<b>Compliance Demonstration:</b>	N/A		
<b>PERFORMANCE TESTING</b> N/A			
<b>Parameter/Pollutant to be Tested:</b>			
<b>Testing Method/Analysis:</b>			
<b>Testing Frequency/Schedule:</b>			
<b>Submittal of Test Results:</b>			
<b>COMPLIANCE MONITORING</b>			
<b>Monitoring Description:</b>	visible emissions		
<b>Monitoring Method:</b>	visual		
<b>Monitoring Regulation/Citation:</b>	326 IAC 2-7-6(1)		
<b>Monitoring Frequency:</b>	daily		
<b>RECORD KEEPING</b>			
<b>Parameter/Pollutant to be Recorded:</b>	visible emissions		
<b>Recording Frequency:</b>	daily		
<b>REPORTING REQUIREMENTS</b>			
<b>Information in Report:</b>	summary of deviations		
<b>Reporting Frequency/Submittal:</b>	as necessary within 10 days of discovery of deviation		
<b>Additional Comments:</b>			

**Table 3**

**Description of facility:** Two (2) shot blasting facilities  
**Max Rating:** 4.0 tons per hour  
**Construction Date:** 1983 (SB-1) and 1988 (SB-2)  
**Control Device (if any):** Baghouse (BH-1)  
**Stack/Vent ID:** SBH-1

**Facility class:** 042      **Description:** Two (2) shot blasting facilities (SB-1 and SB-2)

EMISSION LIMITATIONS			
Numerical Emission Limit:	10.4 pounds PM per hour		
Regulation/Citation:	326 IAC 6-3-2		
Compliance Demonstration:	operate baghouse		
PERFORMANCE TESTING			
Parameter/Pollutant to be Tested:	PM/PM <sub>10</sub>		
Testing Method/Analysis:	OAM approved method		
Testing Frequency/Schedule:	between 60 and 180 days of issuance		
Submittal of Test Results:	Within 45 days of testing		
COMPLIANCE MONITORING			
Monitoring Description:	visible emissions and pressure drop recordings		
Monitoring Method:	visual		
Monitoring Regulation/Citation:	326 IAC 2-7-6(1) & 2-7-5(1)		
Monitoring Frequency:	daily and once per shift		
RECORD KEEPING			
Parameter/Pollutant to be Recorded:	visible emissions and pressure drop recordings		
Recording Frequency:	daily and once per shift		
REPORTING REQUIREMENTS			
Information in Report:	summary of deviations		
Reporting Frequency/Submittal:	as necessary within 10 days of discovery of deviation		
Additional Comments:			

## Indiana Department of Environmental Management Office of Air Management

### Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: Casteel Services, Inc.  
Source Location: 5 Line Road, Kingsbury, Indiana 46345  
County: LaPorte  
Part 70 Operating Permit: T 091-7587-00081  
SIC Code: 3325  
Permit Reviewer: CarrieAnn Ortolani

On November 13, 1997, the Office of Air Management (OAM) had a notice published in the News Dispatch, Michigan City, Indiana, stating that Casteel Services, Inc. had applied for a Part 70 Operating Permit to operate a stationary steel foundry with baghouses as controls. The notice also stated that OAM proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit should be issued as proposed.

Upon further review, the OAM has decided to make the following changes to the Part 70 Operating Permit. The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

1. All references to the IDEM/ Northwest Indiana Office have been removed from the permit, because the Northwest Office is an office of IDEM and not a separate local agency.
2. The Cover Page has been revised as follows:

Issued by:

~~Felicia R. George~~ **Janet G. McCabe**, Assistant Commissioner  
Office of Air Management

3. The page numbers have been removed from the table of contents since the condition numbers are sufficient to identify the location of each condition.
4. Section A (Source Summary) has been changed as follows:

#### **SECTION A**

#### **SOURCE SUMMARY**

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), and presented in the permit application. **The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.**

5. The sand handling system was omitted from the equipment list and facility description. The sand handling system has been added to Section A.2 and the Facility Descriptions in Section D.1 as follows:

(j) **One (1) sand handling system with a maximum capacity of 9.90 tons of sand per hour.**

6. Condition A.5 (Prior Permit Conditions Superseded) has been deleted. Language has been added to Condition B.14 (Permit Shield) to address the effect of prior permit conditions.

---

~~A.5 — Prior Permit Conditions Superseded [326 IAC 2]~~

~~The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.~~

## Section B

7. Condition B.1 (Permit No Defense) part (b) of the condition has been changed as follows:

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, **as set out in this permit in the Section B condition entitled "Permit Shield."**

8. Condition B.8 (Duty to Supplement and Provide Information) part (c) of the condition has been changed as follows:

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. **If the Permittee wishes to assert a claim of confidentiality over any of the furnished records,** ~~For information claimed to be confidential, the Permittee must shall~~ furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, **to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records,** then the Permittee **must shall** furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

9. Condition B.11 (Annual Compliance Certification) has been changed to the following:

---

**B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]**

(a) The Permittee shall annually ~~certify that the source has complied~~ **submit a compliance certification report which addresses the status of the source's compliance** with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was **based on** continuous or intermittent **data**;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); ~~and~~
  - (5) Any insignificant activity that has been added without a permit revision; and**
  - ~~(5)~~ **(6)** Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

~~The notification which shall be submitted~~ **submittal** by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

10. Condition B.12 (Preventive Maintenance Plan) has been changed as follows:

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each **facility**:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing ~~emission units and associated~~ emission control devices;

- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

**If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:**

**Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015**

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

11. Condition B.14 (Permit Shield) has been changed as follows:

B.14 Permit Shield [326 IAC 2-7-15]

---

**(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.**

**(a) (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.** Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided ~~that either of the following:~~

- (1) The applicable requirements are included and specifically identified in this permit; **or**
- (2) ~~IDEM, OAM, in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof.~~ **The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.**

- ~~(b)~~ **(c)** No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. **If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.**
- ~~(c)~~ **(d)** ~~If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.~~ **No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.**
- ~~(d)~~ **(e)** Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- ~~(e)~~ **(f)** This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- ~~(f)~~ **(g)** This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- ~~(g)~~ **(h)** This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

12. Condition B.16 (Deviations from Permit Requirements and Conditions) has been changed as follows:

---

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) **A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:**

- (1) **An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or**
- (2) **An emergency as defined in 326 IAC 2-7-1(12); or**
- (3) **Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.**
- (4) **Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.**

**A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.**

- (b) (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. **The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).**

- (c) (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

13. Condition B.18 (Permit Renewal) part (a) has been changed as follows:

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) **and 326 IAC 2-7-1(40).**



14. Conditions B.19 (Administrative Permit Amendment), B.20 (Minor Permit Modification), and B.21 (Significant Permit Modification) have all been combined into a new Condition B.19 (Permit Amendment or Modification) as follows. Conditions B.20 and B.21 have been deleted and the remainder of Section B has been renumbered. The new B.19 condition reads as follows:

---

**B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

---

- (a) **The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.**

- (b) **Any application requesting an amendment or modification of this permit shall be submitted to:**

**Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015**

**Any such application should be certified by the “responsible official” as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.**

- (c) **The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]**

15. Condition B.26 (now B.24) (Inspection and Entry) has removed “IDEM”, since Local Agencies do not have IDEM identification cards. Also, part (e)(1) and (e)(2) have been added.(only if not already there)

---

**B.24 Inspection and Entry [326 IAC 2-7-6(2)]**

---

Upon presentation of ~~IDEM~~ **proper** identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]

(1) **The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]**

(2) **The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]**

16. Condition B.27 (now B.25) (Transfer of Ownership or Operation) part (b) has been changed as follows:

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. **The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

17. Condition B.28 (now B.26) (Annual Fee Payment) has been changed as follows:

---

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. ~~or in a time period consistent with the fee schedule established in 326 IAC 2-7-19. If the Permittee does not receive a bill from IDEM, OAM, the applicable fee is due April 1 of each year.~~
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) ~~If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.~~

## Section C

18. The source commenced construction prior to August 7, 1977. Therefore, although the source was a major source with a potential to emit 100 tons per year or more of PM and PM<sub>10</sub>, a PSD permit pursuant to 326 IAC 2-2 was not required for the one (1) covered scrap area, identified as CH-1, one (1) pouring facility, identified as P-1, one (1) cooling facility, identified as C-1, one (1) cold shakeout facility, one (1) sand handling system, one (1) chromite core machine, one (1) small molding machine, and one (1) large molding machine, and insignificant activities. The one (1) shot blast facility, identified as SB-1, and one (1) electric induction melting furnace, identified as IF-1, constructed in 1983 and 1982, respectively, were a minor modification to an existing major source. The one (1) electric induction melting furnace, identified as IF-2, and one (1) shot blast facility, identified as SB-2, constructed in 1987 and 1988, respectively, and permitted in this Title V Operating Permit under Enhanced New Source Review also represent a minor modification to an existing major source (not minor source as incorrectly stated in the TSD). Changes to Sections D.1, D.2 and D.3 are indicated in IDEM change 37. Condition C.1 has been changed as follows:

C.1 Major Source  
Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) **and 40 CFR 52.21**, this source is a major source.

19. Condition C.2 (Particulate Matter Emission Limitations for Processes with Process Weight Rates Less Than One Hundred pounds per hour) has been added and the remaining conditions have been renumbered accordingly.

**C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]**

---

**Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.**

20. Condition C.2 (now C.3) has been revised as follows:

**C.3 Opacity [326 IAC 5-1]**

---

**Pursuant to 326 IAC 5-1-2 (Visible Emissions Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions opacity shall meet the following, unless otherwise stated in this permit:**

- (a) **Visible emissions Opacity** shall not exceed an average of forty percent (40%) ~~opacity in twenty-four (24) consecutive readings~~, any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) **Visible emissions Opacity** shall not exceed sixty percent (60%) ~~opacity~~ for more than a cumulative total of fifteen (15) minutes (sixty (60) readings **as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor**) in a six (6) hour period.

~~This condition is not federally enforceable.~~

21. Condition C.3 (now C.4) has been revised as follows:

**C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. ~~This condition is not federally enforceable.~~ **326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.**

22. Condition C.4 (now C.5) has been revised as follows:

**C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]**

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. ~~This condition is not federally enforceable.~~

23. Condition C.5 (now C.6) has been revised as follows:

**C.6 Fugitive Dust Emissions [326 IAC 6-4]**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). ~~Rule 326 IAC 6-4-2(4) regarding visible dust is not federally enforceable.~~ **326 IAC 6-4-2(4) is not federally enforceable.**

24. Condition C.6 (now C.7) (Operation of Equipment) has been changed as follows:

**C.7 Operation of Equipment [326 IAC 2-7-6(6)]**

All air pollution control equipment listed in this permit **and used to comply with an applicable requirement** shall be operated at all times that the emission units vented to the control equipment are in operation. ~~as described in Section D of this permit.~~

25. Condition C.7 (now C.8) (Asbestos Abatement Projects- Accreditation) and Condition C.14 (Asbestos Abatement Projects) have been combined into one condition as follows:

**C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]**

(a) **Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.**

(b) **The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:**

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
  - (A) Asbestos removal or demolition start date;
  - (B) Removal or demolition contractor; or
  - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

26. Condition C.8 (now C.9) (Performance Testing) has had the rule cite changed to 326 IAC 3-6 and the following language has been added:

C.9 Performance Testing ~~[326 IAC 3-2-1]~~ **[326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of 326 IAC ~~3-2-1~~ **3-6** (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days ~~before~~ **prior to** the intended test date. **The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.**

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

**The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

27. Condition C.9 (now C.10) (Compliance Schedule) has been changed as follows:

---

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) **Has certified that all facilities at this source are in compliance with all applicable requirements; and** ~~Will continue to comply with such requirements that become effective during the term of this permit; and~~
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) **Will comply with such applicable requirements that become effective during the term of this permit.** ~~Has certified that all facilities at this source are in compliance with all applicable requirements.~~

28. Condition C.10 (now C.11) (Compliance Monitoring) has been changed as follows:

---

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee **may extend compliance schedule an additional ninety (90) days provided the Permittee shall** notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, **prior to the end of the initial ninety (90) day compliance schedule no more than ninety** after receipt of this permit, with full justification of the reasons for the inability to meet this date. ~~and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.~~

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

29. Condition C.12 (now C.13) (Monitoring Methods) has been changed as follows:

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the **applicable** requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

30. Condition C.14 (Asbestos Abatement Projects) has been deleted and has been incorporated into the revised Condition C.8 (Asbestos Abatement Projects).

~~C.14 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]~~

~~(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos-containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.~~

~~(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:~~

~~(1) When the amount of affected asbestos-containing material increases or decreases by at least twenty percent (20%); or~~

~~(2) If there is a change in the following:~~

~~(A) Asbestos removal or demolition start date;~~

~~(B) Removal or demolition contractor; or~~

~~(3) Waste disposal site.~~

~~(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).~~

~~(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).~~

~~All required notifications shall be submitted to:~~

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (e) ~~Procedures for Asbestos Emission Control~~  
~~The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.~~
- (f) ~~Indiana Accredited Asbestos Inspector~~  
~~The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.~~

31. Condition C.17 (Compliance Monitoring Plan - Failure to Take Response Steps) has had the following rule cites added:

Condition C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5(3)][**326 IAC 2-7-6**] [**326 IAC 1-6**]

32. Condition C.18 (Actions Related to Noncompliance Demonstrated by a Stack Test), has had the rule cites added to the title and following language added:

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [**326 IAC 2-7-5**]  
**[326 IAC 2-7-6]**

- 
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.



**The documents submitted pursuant to this condition do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**

33. Condition C.19 (Emission Statement) part (a) has been changed as follows:

- (a) The Permittee shall submit ~~an certified~~, annual emission statement **certified pursuant to the requirements of 326 IAC 2-6**, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

34. Condition C.21 (General Record Keeping Requirements) has been changed as follows:

---

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)(B)]**[326 IAC 2-7-6]**

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location **for a minimum of three (3) years** and available **upon the request** ~~within one (1) hour upon verbal request of an IDEM, OAM, representative, for a minimum of three (3) years. They~~ **The records** may be stored elsewhere for the remaining two (2) years **as long as they are available upon request** ~~providing they are made available within thirty (30) days after written request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.~~

35. Condition C.22 (General Reporting Requirements) requires a Semi-annual Compliance Monitoring Report instead of a Quarterly Compliance Monitoring Report. In addition, the condition has been revised as follows:

---

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- ~~(a) Reports required by conditions in Section D of this permit shall be submitted to:~~

~~Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015~~

- (a) **To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.**

- (b) **The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:**

**Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015**

- (b) (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (e) (d) Unless otherwise specified in this permit, any **semi-annual** ~~quarterly~~ report shall be submitted within thirty (30) days of the end of the reporting period.
- (d) (e) All instances of deviations **as described in Section B- Deviations from Permit Requirements Conditions** must be clearly identified in such reports. ~~A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:~~
- (1) ~~An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~
  - (2) ~~An emergency as defined in 326 IAC 2-7-1(12); or~~
  - (3) ~~Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.~~
  - (4) ~~Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~
- ~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.~~
- (e) (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (f) (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## Section D

36. Section D (Facility Operation Conditions) has had the following language added to the facility description box in all Section Ds:

<b>Facility Description [326 IAC 2-7-5(15)]</b>
---

The following changes labeled as part of Section D.2 were in Section D.3 in the proposed permit that was on public notice, and changes labeled as part of Section D.3 were in Section D.4 in the proposed permit that was on public notice.

37. As stated in IDEM change 18, the source commenced construction prior to August 7, 1977. Therefore, although the source was a major source with a potential to emit 100 tons per year or more of PM and PM<sub>10</sub>, a PSD permit pursuant to 326 IAC 2-2 was not required for the one (1) covered scrap area, identified as CH-1, one (1) pouring facility, identified as P-1, one (1) cooling facility, identified as C-1, one (1) cold shakeout facility, one (1) sand handling system, one (1) chromite core machine, one (1) small molding machine, and one (1) large molding machine, and insignificant activities. The one (1) shot blast facility, identified as SB-1, and one (1) electric induction melting furnace, identified as IF-1, constructed in 1983 and 1982, respectively, were a minor modification to an existing major source. The one (1) electric induction melting furnace, identified as IF-2, and one (1) shot blast facility, identified as SB-2, constructed in 1987 and 1988, respectively, and permitted in this Title V Operating Permit under Enhanced New Source Review also represent a minor modification to an existing major source (not minor source as incorrectly stated in the TSD).

Condition D.1.2 has been added to the permit and the remainder of Section D.1 has been renumbered accordingly. Condition D.1.2 states:

---

**D.1.2 Prevention of Significant Deterioration [326 IAC 2-2]**

**Any change or modification that results in an increase in the potential to emit after controls of 25 tons per year or more of PM or 15 tons per year or more of PM<sub>10</sub> from the one (1) covered scrap area, identified as CH-1, one (1) pouring facility, identified as P-1, one (1) cooling facility, identified as C-1, one (1) cold shakeout facility, one (1) sand handling system, one (1) chromite core machine, one (1) small molding machine, one (1) large molding machine, and insignificant activities, excluding the two (2) electric induction melting furnaces, shall require a PSD permit pursuant to 326 IAC 2-2, Prevention of Significant Deterioration.**

Condition D.2.3 has been added to Section D.2 and the remainder of Section D.2 has been renumbered accordingly. Condition D.2.3 is as follows:

---

**D.2.3 Prevention of Significant Deterioration [326 IAC 2-2]**

- (a) Any change or modification that results in an increase in the potential to emit after controls to 25 tons per year or more of PM or 15 tons per year or more of PM<sub>10</sub> from the one (1) shot blast facility, identified as SB-1, and one (1) electric induction melting furnace, identified as IF-1, shall require a PSD permit pursuant to 326 IAC 2-2, Prevention of Significant Deterioration.**
- (b) Any change or modification that results in an increase in the potential to emit after controls to 25 tons per year or more of PM or 15 tons per year or more of PM<sub>10</sub> from the one (1) electric induction melting furnace, identified as IF-2, and one (1) shot blast facility, identified as SB-2, shall require a PSD permit pursuant to 326 IAC 2-2, Prevention of Significant Deterioration.**

Condition D.3.2 has also been added to the permit and the remainder of Section D.3 has been renumbered accordingly. Conditions D.1.2 and D.2.3 are repeated in Section D.3 because they also pertain to insignificant activities. Condition D.3.2 restates Conditions D.1.2 and D.2.3 as follows:

---

**D.3.2 Prevention of Significant Deterioration [326 IAC 2-2]**

- (a) As stated in Condition D.1.2, any change or modification that results in an increase in the potential to emit after controls of 25 tons per year or more of PM or 15 tons per year or more of PM<sub>10</sub> from the one (1) covered scrap area, identified as CH-1, one (1) pouring facility, identified as P-1, one (1) cooling facility, identified as C-1, one (1) cold shakeout facility, one (1) sand handling system, one (1) chromite core machine, one (1) small molding machine, one (1) large molding machine, and insignificant activities, excluding the two (2) electric induction melting furnaces, shall require a PSD permit pursuant to 326 IAC 2-2, Prevention of Significant Deterioration.
- (b) As stated in Condition D.2.3(a), any change or modification that results in an increase in the potential to emit after controls to 25 tons per year or more of PM or 15 tons per year or more of PM<sub>10</sub> from the one (1) shot blast facility, identified as SB-1, and one (1) electric induction melting furnace, identified as IF-1, shall require a PSD permit pursuant to 326 IAC 2-2, Prevention of Significant Deterioration.
- (c) As stated in Condition D.2.3(b), any change or modification that results in an increase in the potential to emit after controls to 25 tons per year or more of PM or 15 tons per year or more of PM<sub>10</sub> from the one (1) electric induction melting furnace, identified as IF-2, and one (1) shot blast facility, identified as SB-2, shall require a PSD permit pursuant to 326 IAC 2-2, Prevention of Significant Deterioration.

38. Conditions D.2.5(a) (now D.2.6(a)) (Visible Emission Notations) has been changed as follows:

- (a) Daily visible emission notations of the baghouse stack (SBH-1) stack exhaust shall be performed during normal daylight operations **when exhausting to the atmosphere**. A trained employee shall record whether emissions are normal or abnormal.

39. Condition D.2.6 (now D.2.7) (Parametric Monitoring) has been changed as follows:

---

**D.2.67 Parametric Monitoring**

The Permittee shall record the total static pressure drop across the baghouse (BH-1) used in conjunction with the two (2) shot blasting facilities (SB-1 and SB-2), at least once daily when the two (2) shot blasting facilities (SB-1 and SB-2) are in operation **when venting to the atmosphere**. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 2.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

40. Condition D.2.8 (Baghouse Inspections) has been added to the permit. The remainder of Section D has been renumbered accordingly.

---

**D.2.8 Baghouse Inspections**

**An inspection shall be performed each calendar quarter of all bags controlling the shot blast facilities when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.**

41. Condition D.2.7 (now D.2.9) (Broken Bag or Failure Detection) has been changed as follows:

---

**D.2.79 Broken Bag or Failure ~~Failed~~ Bag Detection**

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. **Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**
- (b) ~~Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.~~ **For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

42. Condition D.2.8 (now D.2.10) (Record Keeping Requirements) has been changed as follows:

---

**D.2.89 Record Keeping Requirements**

- (a) To document compliance with Condition ~~D.2.4~~ and D.2.5 **and D.2.6**, the Permittee shall maintain records of daily visible emission notations of the baghouse stack (SBH-1) exhaust.
- (b) To document compliance with Condition ~~D.2.6~~ **D.2.7**, the Permittee shall maintain the following:
  - (1) Daily records of the following operational parameters during normal operation **when venting to the atmosphere:**

- (A) Inlet and outlet differential static pressure; and
  - (B) Cleaning cycle: frequency and differential pressure.
  - (2) Documentation of all response steps implemented, per event.
  - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
  - (4) Quality Assurance/Quality Control (QA/QC) procedures.
  - (5) Operator standard operating procedures (SOP).
  - (6) Manufacturer's specifications or its equivalent.
  - (7) Equipment "troubleshooting" contingency plan.
  - (8) Documentation of the dates vents are redirected.**
  - (c) To document compliance with Condition D.2.8, the Permittee shall maintain records of the results of the inspections required under Condition D.2.8 and the dates the vents are redirected.**
  - (c)(d)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
43. Conditions D.1.2 (now D.1.3) and D.3.2 (now D.3.3) (Testing Requirements) have been changed as follows:

**D.1.23 Testing Requirements [326 IAC 2-7-6(1),(6)]**

---

~~Testing of~~ **The Permittee is not required to test** these facilities ~~is not specifically required~~ by this permit. However, **IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance.** If testing is required **by IDEM**, compliance with the PM limits specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. ~~This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

**D.3.23 Testing Requirements [326 IAC 2-7-6(1),(6)]**

---

~~Testing of~~ **The Permittee is not required to test** these facilities ~~is not specifically required~~ by this permit. However, **IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance.** If testing is required **by IDEM**, compliance with the PM limits specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. ~~This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

44. Condition D.2.3 (now D.2.4) (Testing Requirements) has been changed as follows:

---

**D.2.34 Testing Requirements [326 IAC 2-7-6(1),(6)]**

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM testing **of the two (2) shot blast facilities, SB-1 and SB-2**, utilizing Methods 5 or 17 (40 CFR 60, Appendix A), or other methods as approved by the Commissioner. This test shall be repeated at least once every **five (5) years** from the date of this valid compliance demonstration. **In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.**

45. Condition D.2.4 (now D.2.5) has been revised as follows, because the baghouse must be operated at all times to demonstrate compliance with 326 IAC 6-3 (Process Operations):

---

**D.2.45 Particulate Matter (PM)**

The baghouse (BH-1) for PM control shall be in operation at all times when either or both of the two (2) shot blasting facilities (SB-1 and SB-2) are in operation ~~and exhausting to the outside atmosphere.~~

## **Forms**

46. In the Certification Form, the words "Emergency/Deviation Occurrence Reporting Form" have been deleted as shown in form as follows.
47. The Quarterly Compliance Report is now called the Semi-Annual Compliance Monitoring Report, the column marked "No Deviations" has been deleted and the language has been changed as indicated in the following pages.
48. The Emergency/Deviation Occurrence Reporting Form has had the phrase "Attach a signed certification to complete this report" deleted from the bottom of the second page. The changes are shown in the following pages.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Casteel Services, Inc.  
Source Address: 5 Line Road, Kingsbury, Indiana 46345  
Mailing Address: P.O. Box 355, Kingsbury, Indiana 46345-0355  
Part 70 Permit No.: T 091-7587-00081

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

9 Annual Compliance Certification Letter

~~9 Emergency/Deviation Occurrence Reporting Form~~

9 Test Result (specify) \_\_\_\_\_

9 Report (specify) \_\_\_\_\_

9 Notification (specify) \_\_\_\_\_

9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: Casteel Services, Inc.  
Source Address: 5 Line Road, Kingsbury, Indiana 46345  
Mailing Address: P.O. Box 355, Kingsbury, Indiana 46345-0355  
Part 70 Permit No.: T 091-7587-00081

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

This report is an affirmation that the source has met all the **compliance monitoring** requirements stated in this permit. This report shall be submitted ~~quarterly~~ **semi-annually**. Any deviation from the **compliance monitoring** requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify ~~zero in the column marked "No Deviations"~~ **in the box marked "No deviations occurred this reporting period"**.

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD**

**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD. LIST EACH COMPLIANCE MONITORING REQUIREMENT EXISTING FOR THIS SOURCE:**

<b>Compliance Monitoring Requirement</b> (e.g. Permit Condition D.1.3)	<b>Number of</b> <b>Deviations</b>	<b>Date of each</b> <b>Deviations</b>	<del>No</del> <del>Deviations</del>

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

~~Attach a signed certification to complete this report.~~

On December 11, 1997, William J. Downey of Casteel Services, Inc., submitted comments on the proposed Part 70 Operating Permit. The comments are as follows:

**Comment 1:**

**Description of Process Equipment:** We would like to request the following changes to the descriptions of the process equipment in Section A.2 of the permit:

Please remove the following emission units from Section A.2:

- (b) One (1) electric induction melting furnace, identified as IF-1, with a capacity of 2.0 tons of metal per hour.
- (j) One (1) electric induction melting furnace, identified as IF-2, with a capacity of 2.0 tons of metal per hour, constructed in September 1987.

These emission units are insignificant activities. The PM and PM<sub>10</sub> uncontrolled potential to emit are less than 5 pounds per hour or 25 pounds per day for each furnace.

**Response 1:**

The electric induction furnaces were not listed as insignificant activities in the Part 70 permit application, but are insignificant activities based on potential emission calculations. The two (2) electric induction furnaces (IF-1 and IF-2) have been moved from Section A.2, Emission Units and Pollution Control Equipment Summary, to Section A.3, Specifically Regulated Insignificant Activities. In addition, Section D.2 has been deleted. Condition D.2.1 has been moved to Condition D.4.1(a) (now D.3.1(a)) and Condition D.2.2 has been incorporated into Condition D.4.2 (now D.3.3). Conditions D.2.3 and D.2.4 no longer apply because the electric induction furnaces are insignificant activities. Section D.3 for the shot blasting units has been changed to Section D.2 as a result of these revisions, and Section D.4 for insignificant activities is now Section D.3.

**Comment 2:**

**Specifically Regulated Insignificant Activities A.3:** We would request to remove this condition from the permit because the shakeout/knockout; chipping/grinding; arc wash; annealing furnaces and the sand silos are insignificant activities and are not specifically regulated under NSPS or NESHAP standards.

**Response 2:**

While the shakeout/knockout, chipping/grinding, arc wash, annealing furnaces, and sand silos are not specifically regulated under NSPS or NESHAP standards, they are regulated by state rules, specifically 326 IAC 6-3-2, Process Operations. There is no change to the permit as a result of this comment.

**Comment 3:**

**Source Operation Condition C.4, Incineration:** We would request that this condition be removed from our permit, since we do not have any equipment at our facility that is designed for incineration, and which would be subject to either 326 IAC 4-2 or 326 IAC 9-1-2.

**Response 3:**

Condition C.4 (now C.5) states, "The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2." Condition C.4 (now C.5) is a general prohibition against improper incineration that applies to all sources, whether the source has incinerators or not. Waste material can only be burned in equipment that meets the cited requirements. The condition is not changed.

**Comment 4:**

**Source Operation Condition C.16, Risk Management Plan:** We do not have any regulated substances present in quantities greater than the threshold quantities listed in 40 CFR 68, and therefore would request that this condition be eliminated from the Part 70 Permit.

**Response 4:**

The Risk Management Plan provision does not state that the Permittee has more than the threshold quantity of a regulated substance. Condition C.16, Risk Management Plan, begins, "If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement..." Although the condition is not applicable at the present time, the provision may be applicable if the Permittee meets the threshold at some time in the future. The condition remains in the permit.

**Comment 5:**

**Source Operation Condition C.19, Compliance Monitoring Plan - Failure to Take Response Steps:** We do not believe that 40 CFR Part 70, or 326 IAC 2-7 provides any authority to require the preparation of a Compliance Response Plan (CRP) or to establish the basis for a violation of the permit for failure to conduct the identified response steps. Failure to take specific response steps should not be interpreted in any way as evidence of non-compliance with an underlying applicable requirement, which is implied by this permit condition. We would request that all references to a Compliance Response Plan be eliminated from this condition.

**Response 5:**

IDEM has worked with members of the Clean Air Act Advisory Council's Permit Committee, Indiana Manufacturing Association, Indiana Chamber of Commerce and individual applicants regarding the Preventive Maintenance Plan, the Compliance Monitoring Plan and the Compliance Response Plan. IDEM has clarified the preventive maintenance requirements by working with sources on draft language over the past two years. The plans are fully supported by rules promulgated by the Air Pollution Control Board. The plans are the mechanism each Permittee will use to verify continuous compliance with its permit and the applicable rules and will form the basis for each Permittee's Annual Compliance Certification. Each Permittee's ability to verify continuous compliance with its air pollution control requirements is a central goal of the Title V and FESOP permit programs.

The regulatory authority for and the essential elements of a compliance monitoring plan were clarified in IDEM's Compliance Monitoring Guidance, in May 1996. IDEM originally placed all the preventive maintenance requirements in the permit section titled "Preventive Maintenance Plan." Under that section the Permittee's Preventive Maintenance Plan (PMP) had to set out requirements for the inspection and maintenance of equipment both on a routine basis and in response to monitoring. Routine maintenance was a set schedule of inspections and maintenance of the equipment. The second was inspection and maintenance in response to monitoring that showed that the equipment was not operating in its normal range. This monitoring would indicate that maintenance was required to prevent the exceedance of an emission limit or other permit requirement. The maintenance plan was to set out the "corrective actions" that the Permittee would take in the event an inspection indicated an "out of specification situation," and also set out the time frame for taking the corrective action. In addition, the PMP had to include a schedule for devising additional corrective actions for out of compliance situations that the source had not predicted in the PMP. All these plans, actions and schedules were part of the Preventive Maintenance Plan, with the purpose of maintaining the Permittee's equipment so that an exceedance of an emission limit or violation of other permit requirements could be prevented.

After issuing the first draft Title V permits on public notice in July of 1997, IDEM received comments from members of the regulated community regarding many of the draft permit terms, including the PMP requirements. One suggestion was that the corrective action and related schedule requirements be removed from the PMP requirement and placed into some other requirement in the permit. This suggestion was based, in some part, on the desire that a Permittee's maintenance staff handle the routine maintenance of the equipment, and a Permittee's environmental compliance and engineering staff handle the compliance monitoring and steps taken in reaction to an indication that the facility required maintenance to prevent an environmental problem.

IDEM carefully considered this suggestion and agreed to separate the "corrective actions" and related schedule requirements from the PMP. These requirements were placed into a separate requirement, which IDEM named the Compliance Response Plan (CRP). In response to another comment, IDEM changed the name of the "corrective actions" to "response steps." That is how the present CRP requirements became separated from the PMP requirement, and acquired their distinctive nomenclature.

Other comments sought clarification on whether the failure to follow the PMP was a violation of the permit. The concern was that a Permittee's PMP might call for the Permittee to have, for example, three "widget" replacement parts in inventory. If one widget was taken from inventory for use in maintenance, then the Permittee might be in violation of the PMP, since there were no longer three widgets in inventory, as required by the PMP. Comments also expressed a view that if a maintenance employee was unexpectedly delayed in making the inspection under the PMP's schedule, for example by the employee's sudden illness, another permit violation could occur, even though the equipment was still functioning properly.

IDEM considered the comments and revised the PMP requirement so that if the Permittee fails to follow its PMP, a permit violation will occur only if the lack of proper maintenance causes or contributes to a violation of any limitation on emissions or potential to emit. This was also the second basis for separating the compliance maintenance response steps from the PMP and placing them in the Compliance Response Plan (CRP). Unlike the PMP, the Permittee must conduct the required monitoring and take any response steps as set out in the CRP (unless otherwise excused) or a permit violation will occur.

The Compliance Monitoring Plan is made up of the PMP, the CRP, the compliance monitoring and compliance determination requirements in section D of the permit, and the record keeping and reporting requirements in sections C and D. IDEM decided to list all these requirements under this new name, the Compliance Monitoring Plan (CMP), to distinguish them from the PMP requirements. The section D provisions set out which facilities must comply with the CMP requirement. The authority for the CMP provisions is found at 326 IAC 2-7-5(1), 2-7-5(3), 2-7-5(13), 2-7-6(1), 1-6-3 and 1-6-5.

Most Permittees already have a plan for conducting preventive maintenance for the emission units and control devices. It is simply a good business practice to have identified the specific personnel whose job duties include inspecting, maintaining and repairing the emission control devices. The emission unit equipment and the emission control equipment may be covered by a written recommendation from the manufacturer for the regular inspection and maintenance of the equipment. The Permittee will usually have adopted an inspection and maintenance schedule that works for its particular equipment and process in order to keep equipment downtime to a minimum and achieve environmental compliance. The manufacturer may also have indicated, or the Permittee may know from experience, what replacement parts should be kept on hand. The Permittee may already keep sufficient spare parts on hand so that if a replacement is needed, it can be quickly installed, without a delay in the Permittee's business activities and without an environmental violation. For the most part, the PMP can be created by combining present business practices and equipment manufacturer guidance into one document, the Preventive Maintenance Plan (PMP).

The Permittee has 90 days to prepare, maintain and implement the PMP. IDEM is not going to draft the PMP. Permittees know their processes and equipment extremely well and are in the best position to draft the PMP. IDEM's air inspectors and permit staff will be available to assist the Permittee with any questions about the PMP. IDEM may request a copy of the PMP to review and approve.

The Preventive Maintenance Plan requirement must be included in every applicable Title V permit pursuant to 326 IAC 2-7-5(13) and for each FESOP permit pursuant to 326 IAC 2-8-4(9). Both of those rules refer back to the Preventive Maintenance Plan requirement as described in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

- (a) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),
- (b) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and
- (c) The identification and quantification of the replacement parts for the facility which the Permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2)).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. The commissioner may require changes in the maintenance plan to reduce excessive malfunctions in any control device or combustion or process equipment under 326 IAC 1-6-5.

The CRP requirement of response steps and schedule requirements are another example of documenting procedures most Permittees already have developed in the course of good business practices and the prevention of environmental problems. Equipment will often arrive with the manufacturer's trouble shooting guide. It will specify the steps to take when the equipment is not functioning correctly. The steps may involve some initial checking of the system to locate the exact cause, and other steps to place the system back into proper working order. Using the trouble shooting guide and the Permittee's own experience with the equipment, the steps are taken in order and as scheduled until the problem is fixed.

A Permittee will likely already have a procedure to follow when an unforeseen problem situation occurs. The procedure may list the staff to contact in order to select a course of action, or other step, before the equipment problem creates an environmental violation or interrupts the Permittee's business process.

The Compliance Monitoring Plan (CMP) is consistent with IDEM's Compliance Monitoring Guidance released in May of 1996. The guidance discusses corrective action plans setting out the steps to take when compliance monitoring shows an out of range reading (Guidance, page 13). Some of the terminology has changed, as a result of comments from regulated sources, but the requirements in the permit do not conflict with the guidance.

**Comment 6:**

**Facility Operating Condition D.1.2, Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]:** This condition requires that we develop and maintain a Preventive Maintenance Plan. We would request that this condition be eliminated from the permit, since the emission units covered in Section D.1, do not have control devices.

**Response 6:**

According to current IDEM policy, although the facilities do have an applicable requirement, a Preventative Maintenance Plan (PMP) is not mandatory for these facilities since the units do not have control devices, actual emissions are less than 25 tons per year, no NSPS or NESHAP applies, and the units are not limited to avoid the applicability of a specific rule.

The scrap and charge handling operations and the cooling operations have potential PM emissions less than 25 tons per year. Therefore, a PMP and Compliance Monitoring is not required for those facilities.

The pouring facility has potential PM emissions of 49.1 tons per year based on a potential metal capacity of 4.0 tons per hour and actual PM emissions based on the actual process weight rate of 1.5 tons of metal per hour (as provided in the application) of 18.4 tons per year when operating 8,760 hours per year. The cold shakeout has potential PM emissions of 56.1 tons per year when operating at the maximum capacity of 4.0 tons of metal per hour and actual PM emissions based on a process weight rate of 1.5 tons of metal per hour (as provided in the application) of 21.0 tons per year when operating 8,760 hours per year. The sand handling system has potential PM emissions of 28.2 tons per year based on a potential sand handling capacity of 9.9 tons per hour and actual PM emissions based on the actual process weight rate of 3.7 tons of sand per hour (as provided in the application) of 10.5 tons per year when operating 8,760 hours per year.

The core machines have potential PM emissions of 47.7 tons per year based on a total potential sand capacity of 9.9 tons per hour and actual PM emissions based on the actual process weight rate of 3.7 tons of sand per hour (as provided in the application) of 17.8 tons per year when operating 8,760 hours per year. Also, if the facilities operate at full capacity for the normal operating time of 2,000 hours per year, the actual emissions are less than 25 tons per year, from each facility. Based upon these calculations, Conditions D.1.2, D.1.4, and D.1.5 of the proposed permit, requiring a PMP and Compliance Monitoring, have been removed.

**Comment 7:**

**Facility Operation Conditions D.1.4 and D.2.3 Compliance Monitoring Requirements, Visible Emission Notations, and Conditions D.1.5 and D.2.4, Record Keeping requirements:** These conditions require that we do visible emission observations and maintaining records for operations covered in sections D.1 and D.2. We would request that these conditions be eliminated from the permit, since these emission units do not have control devices and have actual emission less than 25 tons/year. According to guidance provided by IDEM, it was our understanding that emission units that meet this criteria were not required to develop compliance monitoring plans, and would not be required to conduct monitoring activities. Further, visual observations would appear to provide no useful information, since there are no control devices.

**Response 7:**

As stated in Responses 1 and 6, Conditions D.1.4, D.1.5, D.2.3 and D.2.4 of the proposed permit have been removed.

**Comment 8:**

**Facility Operation Condition D.3.5 Visible Emissions Notation and D.3.7 Broken Bag and Failure Detection:** These Conditions are not necessary because Condition D.3.6 can provide sufficient compliance monitoring information to assure that the baghouses are operating according to the manufacturer specifications. The following explanation will justify this request.

In our opinion, the potential to emit before controls for the Shot Blasting operations, as stated in the Appendix A, overestimate the emissions. Uncontrolled emissions appear to have been calculated using the calculated controlled emissions, and then dividing by the assumed control efficiency. While we would agree with the use of the grain loading for controlled emission estimates, the uncontrolled emission cannot be accurately estimated as shown in Appendix A of the draft permit.

The Shot Blasting operations are a part of the cleaning and finishing process. In AP-42 Table 12.10-7 (attached) the uncontrolled total PM emission factor for the entire cleaning and finishing process is 17.0 lb of PM/ton of metal processed. This 17.0 lb/ton represents the emissions generated in the building and not the emissions to the atmosphere. Using a 4.0 ton per hour maximum process rate the total uncontrolled potential emission from the two Shot Blasting units is:

$$(17.0, \text{ lb/ton Iron}) \times (4.0 \text{ ton Iron/hr}) \times (8,760, \text{ hrs/yr}) / (2,000 \text{ lb/ton}) = 297.84 \text{ tons/yr.}$$

However, due to the nature of the materials processed in cleaning and finishing, only a small amount of particulates is emitted to atmosphere. The PM<sub>10</sub> emissions are estimated to be 10 to 20% of the total particulates generated in the process. In AP-42 Table 12.10-7 the uncontrolled emission factor for the particulates emitted to atmosphere is 0.1 lb/ton of metal processed. Using this emission factor the total amount of PM emitted to atmosphere is:



$$(0.1, \text{ lb/ton Iron}) \times (4, \text{ ton Iron/hr}) = 0.4 \text{ lb/hr or } 9.6 \text{ lb/day}$$

These calculations were done assuming the worse case scenario of maximum processing rate and 24 hours operation schedule, which we do not anticipate to happen.

Based on this calculation, the Shot Blast units would be considered "insignificant activities" and would not require the operation of the baghouse to comply with the process weight rate limits. These various calculations demonstrate the uncertainty of the current estimation procedures for certain foundry operations. As such, we would propose to retain the Shot Blast units as "significant activities" under the permit, and to keep the baghouse in operation all the time and to operate it according to the manufacturer specifications. However, we request that the testing requirements D.3.3, compliance monitoring requirements D.3.5, D.3.7 and the associated reporting requirements from section D.3 be removed from the permit as we believe that the actual emission levels from these units do not warrant the level of compliance monitoring proposed.

#### Response 8:

The potential PM emissions from shot blasting have been calculated by multiplying the baghouse parameters of grain loading (gr/acfm), filter area (sq ft), and air to cloth ratio (acf/sq ft) and multiplying by 60 min/hr and dividing by 7,000 gr/lb to determine the potential emissions after controls of 2.19 pounds per hour. Using the control efficiency of 98 percent provided in the application the potential emissions are calculated. If the information provided in the application is correct, this calculation should be accurate. Conditions D.3.5 (now D.2.6) and D.3.7 (now D.2.9) will remain in the permit as the allowable emissions based on 326 IAC 6-3-2 are greater than 10 pounds per hour. According to the calculation in the TSD Addendum, the potential to emit PM before controls from the shot blasting is 68.7% of the total source potential to emit before controls. Testing the emissions from the shot blast units will provide more accurate emission factors for the shot blast operations. Thus, testing gives a basis for demonstrating compliance with 326 IAC 6-3-2. Condition D.3.5 (now D.2.6), Visible Emissions Notations, is a way of monitoring compliance with 326 IAC 6-3-2. Condition D.3.7 (now D.2.9), Broken Bag or Failed Bag Detection is important in defining what must be done should the baghouse fail.

#### Comment 9:

**Facility Operation Condition D.3.8 (b)(1)(B), Record Keeping Requirements:** This condition requires that we maintain certain records to demonstrate compliance with the Condition D.3.6. We would request that this condition be amended by eliminating the requirement to maintain records of cleaning cycle: frequency and differential pressure, since these records would have no bearing on our compliance with D.3.6, in addition to D.3.8(b)(1)(A).

#### Response 9:

The record keeping requirement of D.3.8(a) (now D.2.10(a)) documents compliance with D.3.4 (now D.2.5) and D.3.5 (now D.2.6). The wording of D.3.8(a) (now D.2.10(a)) has been changed to "To document compliance with Conditions D.2.5 and D.2.6..." Condition D.3.8(b)(1) (now D.2.10(b)(1)) has been revised as follows:

- (1) Daily records of the **inlet and outlet differential static pressure** following operational parameters during normal operation when venting to the atmosphere.

~~(A) Inlet and outlet differential static pressure; and~~

~~(B) — Cleaning cycle: frequency and differential pressure.~~

**Comment 10:**

**Facility Operation Condition D.4:** As noted earlier, the insignificant activities are not specially regulated activities under NSPS or NESHAP and we would request that section D.4 to be removed from the permit.

**Response 10:**

See Response 2.

**Comment 11:**

**Technical Support Document, Permitted Emission Units:** As noted above, the descriptions of permitted and unpermitted emission units should be corrected to remove the following emission units:

- (b) One (1) electric induction melting furnace, identified as IF-1, with a capacity of 2.0 tons of metal per hour
- (j) One (1) electric induction melting furnace, identified as IF-2, with a capacity of 2.0 tons of metal per hour, constructed in September 1987

These emission units shall be added to the list of insignificant activities.

**Response 11:**

The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. The Technical Support Document, therefore, is not amended. The appropriate change has been made to the permit as indicated in Response 1.

**Comment 12:**

**Technical Support Document, Existing Approvals:** The list of existing approvals should be amended by deleting the registration. We do not have this registration on file and there is no registration number for the one existing at IDEM.

**Response 12:**

The Technical Support Document is not amended. A copy of this registration is attached. This permit, as proposed, also satisfies the requirements of Enhanced New Source Review.